

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

Plaintiffs,

v.

COMMONWEALTH OF PUERTO RICO,
et. al.

Defendants.

CIVIL NO. 12-2039 (GAG)

BRIEF EXTENSION OF TIME TO FILE JOINT STIPULATION ON FIELD
COMPLIANCE AND ASSESMENT ACTIVITIES BY THE TCA

TO THE HONORABLE COURT:

COME NOW the COMMONWEALTH OF PUERTO RICO and the PUERTO RICO POLICE DEPARTMENT, through the undersigned counsel, and respectfully allege and pray as follows:

1. On July 18, 2017, the Technical Compliance Advisor filed an informative motion seeking that the court note the information contained therein and to clarify this Honorable Courts Order at Docket No. 511. (See Docket 561)

2. The above mentioned motion stated the following "*The TCA further informs the Court, that during the course of the meeting held on July 17, 2017, the parties were reminded to file, not later than Wednesday, July 19, 2017, the joint motion requested by the court during the Ponce Hearing on May 22, 2017.*" (See Docket 561, ¶ 6)

3. The Commonwealth became aware of this deadline for the first time on the July 17, 2017. It is common knowledge that it is impossible to be reminded of a fact or deadline that the parties were not aware of. Nonetheless the Commonwealth requests an extension of time to file the joint stipulation on field compliance and assessment activities by the TCA before July 21, 2017.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above stated and grant this instant motion for an extension of time.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on July 19, 2017.

WANDA VÁZQUEZ GARCED
Secretary of Justice

WANDYMAR BURGOS VARGAS
Deputy Secretary in Charge of
Litigation
Department of Justice

SUSANA PEÑAGARÍCANO BROWN
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